

James T. Shirley, Jr. (JTS 6114)
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICHAEL WILLIAMSON, THE ESTATE OF
DON C. CRAFT, KIRK O'DONNELL,
JOHN LETTOW, TIMOTHY MCGINNIS,
FRED NEWTON, WILLIAM WATSON, CHRIS
HANCOCK, DALE SCHOENEMAN, and
INTERNATIONAL DEEP SEA SURVEY, INC.,

Plaintiffs,

v.

RECOVERY LIMITED PARTNERSHIP,
COLUMBUS EXPLORATION, LLC,
COLUMBUS-AMERICA DISCOVERY GROUP, INC.
COLUMBUS EXPLORATION LIMITED
PARTNERSHIP, OMNI ENGINEERING, INC.,
OMNI ENGINEERING OF OHIO, INC.,
ECONOMIC ZONE RESOURCE ASSOCIATES,
ECONOMIC ZONE RESOURCE ASSOCIATES, LTD.,
EZRA, INC., EZRA OF OHIO, INC., ECON
ENGINEERING ASSOCIATES, INC., DOE.E, INC.,
THOMAS G. THOMPSON, GILMAN D. KIRK,
JAMES F. TURNER, MICHAEL J. FORD, and
W. ARTHUR CULLMAN, JR.,

Defendants.

06 Civ. 5724 (LTS)

CERTIFICATE OF SERVICE

STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

RUDY D. GREEN, an attorney admitted to practice in the Courts of the State of New


York, affirms under penalty of perjury:

That on November 16, 2006, I served a true copy of the attached Memo Endorsed via telefax to the following:

Daniel S. Moretti, Esq.
Fax No.: (212) 238-4848

Richard Robol, Esq.
Fax No.: (614) 737-3756

William Mattes, Esq.
Fax No.: (614) 628-6890



RUDY D. GREEN

Dated: November 17, 2007

EXHIBIT

Holland Knight

Tel 212 513 3200
Fax 212 385 9010Holland & Knight LLP
195 Broadway
New York, NY 10007-3189
www.hklaw.com**TO:**

Daniel S. Moretti, Esq.	Landman Corsi Ballian & Ford P.C.	(212) 238-4848
NAME	COMPANY/FIRM	FAX NUMBER
New York	NY	
CITY	STATE	(TELEPHONE NUMBER)

TO:

Richard Robol, Esq.		(614) 737-3739 <i>3156</i>
NAME	COMPANY/FIRM	FAX NUMBER

TO:

William Mattes, Esq.		(614) 628-8901 <i>6890</i>
NAME	COMPANY/FIRM	FAX NUMBER

FROM:

Rudy Green	(212) 513-3591	4
NAME	TELEPHONE	TOTAL PAGES (Including Cover Sheet)

FOR THE RECORD:

DATE: November 16, 2006	URGENCY: <input type="checkbox"/> SUPER RUSH	<input type="checkbox"/> RUSH <input type="checkbox"/> REGULAR
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MESSAGE:

Attached is a Memo Endorsed adjourning the conference to a holding date of March 2, 2007.

**CHAMBERS OF HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK
500 PEARL STREET
NEW YORK, NEW YORK 10007
TELEPHONE: (212) 805-0417**

FAX COVER SHEET

Date: November 16, 2006

FAX NUMBER TRANSMITTED TO: (212) 385-9010

To: James T. Shirley, Jr., Esq.

It is ordered that counsel to whom this Memo Endorsement is sent is responsible for faxing or otherwise delivering promptly a copy to all counsel and unrepresented parties and filing a certificate of such service within 5 days from the date hereof. Do not fax such certification to chambers.

NUMBER OF PAGES 2 NOT COUNTING COVER SHEET. IF YOU DO NOT RECEIVE ALL PAGES, PLEASE TELEPHONE US IMMEDIATELY AT (212) 805-0417.

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November 15, 2006

James T. Shirley, Jr.
212 513 3561
jim.shirley@hklaw.com

VIA TELECOPIER: (212) 805-0426

Honorable Laura T. Swain
United States District Judge
United States Courthouse
500 Pearl Street, Room 755
New York, New York 10007-1312

MEMO ENDORSED

IT IS ORDERED that counsel to whom this ~~Memo~~ Endorsement is sent is responsible for faxing ~~or~~ otherwise delivering promptly a copy to all counsel and unrepresented parties and filing a certificate of such service within 5 days from the date hereof. Do not fax such certification to Chambers.

Re: *Michael Williamson, et al. v. Recovery Limited Partnership, et al.*
06 Civ. 5724 (LTS)
Our File No.: 508860-00001

Dear Judge Swain:

We are counsel for the Williamson Plaintiffs in the referenced matter.

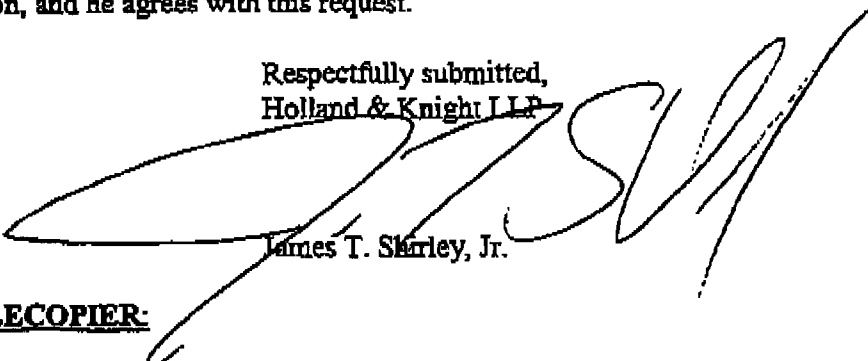
According to Your Honor's INITIAL CONFERENCE ORDER, counsel for the parties are required to prepare and file a Preliminary Pre-Trial Statement on or before November 22, 2006, and attend a pre-trial conference before Your Honor at 3:00 p.m. on December 1, 2006. We write to request that the deadline for the submission and the date for the conference be adjourned *sine die* for the following reasons:

1. This is a Supplemental Admiralty Rule B attachment proceeding for purposes of obtaining security in a matter that is pending before the Hon. Edmund Sargus, U.S.D.J. in the U.S. District Court for the Southern District of Ohio, and the matter will be tried on the merits in that court and not in the Southern District of New York.
2. There is currently pending before Your Honor a Motion to Vacate the attachments which have been made and to dismiss the attachment proceeding in New York. Since the trial on the merits will be in Ohio, we do not envision a trial in New York, irrespective of which way the motion is decided.

Honorable Laura T. Swain
November 15, 2006
Page 2

The undersigned has spoken to Daniel Moretti, Esq., New York counsel for the Defendants in this action, and he agrees with this request.

Respectfully submitted,
Holland & Knight LLP


James T. Shirley, Jr.

cc: ALL VIA TELECOPIER:

Landman Corsi Ballian & Ford P.C.
Attorneys for Defendants
Attn: Daniel S. Moretti, Esq.
Nicole Dyer, Esq.

Fax No.: (212) 238-4848

Richard Robol, Esq.

Fax No.: (614) 737-3739


William Mattes, Esq.

Fax No.: (614) 628-8901

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*The conference is adjourned to a holding date of
March 2, 2007 at 10:30 AM and the submission
requirements are adjourned sine die.*

SO ORDERED.

 11/16/2006
LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

Group Send Report

Page : 001
Date & Time: Nov-16-06 04:30pm
Line 1 : 212
Line 2 :
Machine ID : HOLLAND AND KNIGHT

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Date : Nov-16 04:21pm
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End time : Nov-16 04:51pm
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